

**Federal Defenders
OF NEW YORK, INC.**

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David E. Patton
Executive Director

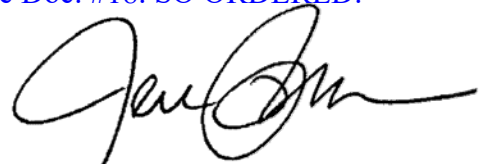
Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

February 10, 2023

By ECF

Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Application GRANTED. The Court will hold a bail hearing on February 16, 2023, at 10:30 a.m. The Government shall immediately notify the Probation Department and have them email a copy of the PTS report prior to the hearing. The Clerk of Court is directed to terminate Doc. #18. SO ORDERED.



February 13, 2023

Re: *United States v. Jose Martinez*, 22 Cr. 492 (JMF)

Dear Judge Furman:

I write to respectfully request that the Court revoke the order detaining Mr. Martinez pursuant to 18 U.S.C. § 3145(b).

Jose Martinez was arrested on September 21, 2022, and presented that same day before Magistrate Judge Figueredo. After argument, Judge Figueredo ordered Mr. Martinez detained. He has remained at the Metropolitan Detention Center since that date.

Because there are conditions of release that can reasonably assure Mr. Martinez's appearance in court as well as the safety of the community – including a personal recognizance bond co-signed by three financially responsible persons, and home detention enforced by electronic monitoring – I respectfully move for a revocation of the detention order pursuant to 18 U.S.C. § 3145(b), and request that the Court schedule a hearing on the matter.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ _____

Martin S. Cohen
Ass't Federal Defender
(212) 417-8737

cc: All counsel of record, by ECF